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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO VISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court’s Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, filed in connection with Plaintiffs’ Reply to Defendant Meta Platforms, Inc.’s Opposition to Motion to Amend Case Management Schedule (the “Reply”). The Declaration of Jonathan Krein in Support of the Reply to Plaintiffs’ Motion to Amend Case Management Schedule (the “Krein Declaration”), and Exhibit A of Holden Benon’s Declaration in Support of the Reply to Plaintiffs’ Motion to Amend Case Management Schedule (the “Benon Declaration”) contain, in various places, summaries or descriptions of material that Defendant Meta Platforms, Inc., designated as “Confidential” or “Attorneys Eyes Only,” as defined in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”). Pritt Sealing Decl. ¶ 3.

On Friday, October 4, 2024, at 6:14 AM, Margaux Poueymirou of the Joseph Saveri Law Firm LLP, counsel for Plaintiffs, emailed Kathleen Hartnett of Cooley LLP, counsel for Defendant Meta Platforms, Inc., along with Defendant’s other counsel of record, for permission to file publicly the information Defendant designated “Confidential” or “Attorneys Eyes Only.” Pritt Sealing Decl. ¶ 4. Ex. A. Ms. Hartnett responded at 8:47 AM, stating, among other things, “[Y]es, Meta’s highly confidential source code and discussion of that source code should be filed under seal.”

The Protective Order in this case applies to “any information copied or extracted from Protected Material” and “summaries” of Protected Material, and prohibits Plaintiff from filing any material designated under the Protective Order without written permission from Defendant. ECF No. 90 at 3-4, 21. Accordingly, Plaintiffs filed a public version of the Krein Declaration and Exhibit A of the Benon Declaration to the docket via ECF redacting references to such extracted

information or summaries and will submit unredacted, highlighted versions separately to the Court and to Defendant.

Dated: October 4, 2024

Respectfully submitted,  
**BOIES SCHILLER FLEXNER LLP**

/s/ Maxwell V. Pritt

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